UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



EPA United States Environmental Protection Office of Pesticide Programs Agency

MEMORANDUM

9/12/2019

SUBJECT: Product Chemistry Review for *CRB*,

EPA Reg. No.: 5813-120, DP 453995

FROM: SRodriguez, chemist

> Product Science Branch, CT Team Antimicrobials Division (7510P)

Karen Hicks, Team Leader THRU:

Product Science Branch

Antimicrobials Division (7510P)

TO: Demson Fuller, PM Team 32 / Wanda Henson

> Regulatory Management Branch II Antimicrobials Division (7510P)

Registrant: The Clorox

Co.

Action code: 575 Agency Due Date: 11/30/2019 Science Due Date:

9/21/2019

Submission No.: 1038712 E-Sub No.: 41815

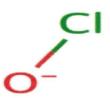
Classification: EP Process: Nonintegrated

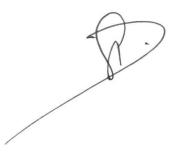
system

Pesticide classification: Antimicrobial & Sanitizer

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
014703	7681-52-9	Sodium Hypochlorite	7.50







I. BACKGROUND

The Registrant, The Clorox Co., has submitted the OPPTS Guideline Series 830.6317 & 830.6320 in support for their product: <u>CRB</u> EPA Reg. No. <u>5813-120</u>. This product kills parasites fungi or their spores and inhibits their growth of bacteria as disinfectants, antiseptics or antibiotics and kills or irreversibly inactivates at least 99.9 % of bacteria, fungi & viruses

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	Ø	
EPA FORM 8570-27 – Formulator's Exemption Statement		Ø
EPA FORM 8570-34 – Certification with respect to citation of data		Ø
EPA FORM 8570-35 – Data Matrix (8/9/2019)	Ø	
Cover letter (8/9/2019)	Ø	
Transmittal document		Ø
Proposed CSF: N/A	Ø	Ø
Proposed label, (7/25/2019)		Ø
Certification for Pilot Fragrance Notification Program		Ø
REFERENCED: Basic CSF, dated 8/9/18		

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food
					use
Non-integrated			Ø		Ø
Integrated					
Active Ingr	Active Ingredients(s)			Upper	Lower
				limit	limit
Sodium Hy	Sodium Hypochlorite			9.45	5.17

	Acceptable	Not	N/A
		Acceptable	
1. The certified limits of all ingredients are within 40	\bowtie		
CFR standard certified limits.			
2. Wider certified limits were requested, and rationale			\boxtimes
was accepted.			
3. The nominal concentration(s) of the active	Ø		
ingredient is in agreement with the label.			
4. The chemical IDs and analytical information for	Ø		
density, pH, and flammability are consistent with			
Series 830 Group B data.			
5. All inert ingredients are approved for non-food use	Ø		
pesticide formulations.			
6. The impurities present >0.1% are identified.			\boxtimes
7. Impurities of toxicological significance have an			Ø
upper certified limit.			
b. Product Label:			

	Yes	NO	N/A
The formula contains one of the following:			
1. 10% or more of petroleum distillate		\bowtie	
2. 1.0% or more of methyl alcohol		Ø	
3. Sodium nitrite at any level		Ø	
4. A toxic list 1 inert at any level		Ø	
5. Arsenic in any form		Ø	
6. If yes to 2-6, then the inert ingredient list contains a relevant		Ø	
footnote			
7. Appropriate warning statements regarding flammability or			\bowtie
explosive characteristics of the product are included on the			
label			
8. The storage and disposal instructions for the pesticide	\boxtimes		
container follow PR Notice 84-1 for household use products or			
PR Notice 83-3 for all other uses.			
9. The product requires an expiration date at which time the			\bowtie
nominal concentration falls below the lower certified limit.			

IV. Conclusion: Product Science Branch of Antimicrobials Division finds the proposed OPPTS Guideline Series 830.6317 "Storage stability" & 830.6320 "Corrosion characteristics" studies, supporting the antimicrobial & sanitizer, non-integrated, non-food use, end-use product EPARN:

5813-120 to be acceptable

V. Table B: Series 830 guidelines - Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6317	Storage stability	Product is stable	Acceptable	50914801
830.6320	Corrosion	Container is stable	Acceptable	50914801
	characteristics			